

COUNTY OF MARIN  
COMMUNITY DEVELOPMENT AGENCY

Attachment 1

Environmental Health Services  
3501 Civic Center Drive, Rm 236  
San Rafael, CA 94903  
(415) 499-6907  
FAX (415) 507-4120

March 10, 1998

Doug Diemer, Site Manager  
Redwood Landfill  
P.O. Box 793  
Novato, CA 94948

Dear Mr. Diemer:

In letters to you dated May 16, 1996 and September 3, 1996 Environmental Health Services, as the Local Enforcement Agency (LEA) responsible for solid waste activities in Marin County, granted to Redwood Landfill interim use of the following types of alternative daily cover (ADC) materials applied over refuse: shredded green material, wet sludge mixed with shredded green material, wet sludge mixed with soil, and dried sludge. While the above referenced letters allowed for continued use of "non-permitted" ADC processing methods, that allowance was granted because it was our expectation that a revision of Redwood's SWFP was imminent.

Only one type of ADC, alkaline stabilized sludge, was evaluated in the 1994 Environmental Impact Report and subsequently placed into the present Solid Waste Facility Permit. Alkaline stabilization was the approved indoor method used to stabilize sludge and remove volatile organic compounds and odors.

We are aware that the California Integrated Waste Management Board has approved all of the ADC materials we allowed for in our letters to you. However, it is the contention of the LEA and the CIWMB staff that while a product may be deemed suitable as an ADC, both the process(es) used to obtain the products and the site specific application of the products require further evaluation before formal permitting.

Therefore, due to the above and following considerations, the LEA directs you to discontinue the use of sludge derived alternative daily cover:

- Timely environmental review and formal permitting has not occurred.
- Controversy regarding air quality issues continues.
- Approval from all appropriate agencies has not been given.

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The LEA is willing to allow the interim use of shredded greenwaste as ADC until permit revision is completed, or unless other unforeseen circumstances demands its discontinuance.

We enthusiastically support activities which beneficially reuse elements of the waste stream. However, it is our responsibility to insure that before entitlement is granted, all appropriate statutes and regulations have been met. To that end, we encourage you to include in your upcoming project description a request to allow for whichever ADC process (es) and products you wish to pursue.

Please feel free to contact me at (415) 499-6907 if you have any questions or require additional information.

Sincerely,



Edward J. Stewart, Chief  
Environmental Health Services

cc: Deborah Bialosky, County Counsel  
Pat Faulkner, County Counsel  
Alan Friedman, S.F. Bay RWQCB  
Reinhard Hohlwein, CIWMB  
Scott Walker, CIWMB  
Harry Moore, Supervisor  
Mark Riesenfeld, CDA Director  
Carol Allen, BAAQMD  
Rod Wood, City of Novato  
Barbara Salzman, Marin Audubon Society